

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

WEBROOT, INC. and OPENTEXT, INC.,

Plaintiffs,

v.

AO KASPERSKY LAB, KASPERSKY)
LABS LIMITED, and KASPERSKY)
LAB SWITZERLAND GmbH,

Defendants.

Civil Action No. 1:23-cv-91649-LTS

ASSENTED-TO MOTION FOR ADMISSION *PRO HAC VICE* OF JEFFREY D MILLS

The undersigned counsel for Plaintiffs Webroot, Inc. and OpenText, Inc. (“OpenText”), and a member of the bar of this Court, hereby requests, pursuant to Local Rule 83.5.3, that Jeffrey D. Mills, King & Spalding LLP, be permitted to practice before this court *pro hac vice* as counsel for OpenText. In support of this motion, the undersigned submits as follows:

1. The business address of Mr. Mills is 500 West 2nd Street, Suite 1800, Austin, Texas 78701; telephone number, (512) 457-2027; email, jmills@kslaw.com.
2. As stated in his declaration submitted pursuant to Local Rule 83.5.3, attached hereto as Exhibit 1, Mr. Mills is a member in good standing of the bars of the State of Texas, the State of California, the State of Illinois, and the District of Columbia and admitted to practice in several federal courts, and there are no disciplinary proceedings pending against him.
3. Mr. Mills is familiar with the factual and legal issues involved in this case, as well as the Local Rules of the United States District Court for the District of Massachusetts.
4. My appearance as counsel for OpenText is on record.
5. Counsel for the Non-Party Witnesses assents to this motion.

WHEREFORE, it is respectfully requested that the Court grant leave to Jeffrey D. Mills to appear and practice before this Court *pro hac vice* on behalf of OpenText in all proceedings in this action.

Dated: December 22, 2023

Respectfully submitted,

/s/ Nicholas Ramacher

Nicholas J. Ramacher (BBO# 680258)

Donnelly, Conroy & Gelhaar, LLP

260 Franklin St., Suite 1600

Boston, MA 02110

(617) 720-2880

(617) 720-3554

njr@dcglaw.com

LOCAL RULE 7.1(a)(2) CERTIFICATION

I, Nicholas J. Ramacher, counsel for OpenText in the above captioned matter, hereby certify that, pursuant to Rule 7.1(a)(2) of the Local Rules of the United States District Court of Massachusetts, counsel for the OpenText conferred with counsel for the Non-Party Witnesses on December 21, 2023, by email regarding this motion, and counsel for the Non-Party Witnesses informed us that the Non-Party Witnesses assent to this motion.

Dated: December 22, 2023

/s/ Nicholas Ramacher

Nicholas J. Ramacher (BBO# 680258)

CERTIFICATE OF SERVICE

I hereby certify that on December 22, 2023, a true copy of the foregoing document was filed through the CM/ECF system, and that a true copy of the document will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Nicholas Ramacher
Nicholas J. Ramacher (BBO# 680258)